STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF MANAGEMENT AND BUDGET
STATE PLANNING COORDINATION

May 25, 2006

Mr. Kenneth Christenbury
Axiom Engineering
6 W. Market Street, Ste. 1B
Georgetown, DE 19947

RE: PLUS review – PLUS 2006-04-05; Georgetown Hunt

Dear Mr. Christenbury:

Thank you for meeting with State agency planners on May 3, 2006 to discuss the proposed plans for the Georgetown Hunt project to be located on North Bedford Street, in Georgetown.

According to the information received, you are seeking site plan approval for 80 single family homes on 21.92 acres.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as the Town of Georgetown is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the Town.

Executive Summary

The following section includes some site specific highlights from the agency comments found in this letter. This summary is provided for your convenience and reference. The full text of this letter represents the official state response to this project. ***Our office***

notes that the applicants are responsible for reading and responding to this letter and all comments contained within it in their entirety.

State Strategies/Project Location

- The proposed project is located within an Investment Level 1 area according to the *Strategies for State Policies and Spending* and within the Town of Georgetown. In these areas, State policies support development that is consistent with the character of the area.

Street Design and Transportation

- DelDOT has a project under development to add sidewalks along North Bedford Street as far north as the North Georgetown Elementary School. The plans for the subject development should be coordinated with that project, and the developer may be required to provide right-of-way for the project and/or to build a section of it along their frontage.

- While the use of wooded area in the southwest corner of the site for open space seems appropriate, DelDOT suggests that the proposed tot lot be moved to a more central location in the development to improve both access and safety. If this is not possible, a fence should be provided to prevent poorly attended children from wandering onto North Bedford Street.

- Along the south edge of the subject land, there is a private right-of-way leading to a two-parcel enclave of land under County jurisdiction. If possible, the developer should work with the owners of that right-of-way to obtain the portion from Surrey Lane west and incorporate it into their development. Doing so would enable the proposed extension of Surrey Lane into the proposed development and eliminate traffic along the rear property line of the lots presently proposed to abut that right-of-way. One thing that the developer could offer in this regard, and that the Town should consider requiring, is the reservation of land for a proper street connection from the proposed development to the enclave.

- DelDOT commends the developer for providing the proposed stub street to the lands of Alice C. Brumley.

- The lots proposed along the west edge of the property should be buffered from the railroad line there. DelDOT recommends berms and vegetative screening, but at a minimum a fence should be provided to discourage residents from walking along the right-of-way.

Natural and Cultural Resources

- Since a significant portion of the farmed lands on this parcel contain wetland associated (hydric) soils, it is possible that they some of these farmed wetlands may be jurisdictional. Therefore, it is recommended that the Farm Services Agency of the USDA be contacted to assess whether any of the lands on subject parcel meet the recognized criteria for classification as "prior converted wetlands."

- It is recommended that the applicant consider removing lot #'s 44 and 45 to reduce the need to clear trees. In addition, trees should not be cleared from April 1st to July 31st to reduce impacts to birds and other wildlife that utilize forests for breeding.

The following are a complete list of comments received by State agencies:

Office of State Planning Coordination – Contact: Herb Inden 739-3090

The proposed project is located within an Investment Level 1 area according to the *Strategies for State Policies and Spending* and within the Town of Georgetown. In these areas, State policies support development that is consistent with the character of the area.

Division of Historic and Cultural Affairs (DHCA) – Contact: Alice Guerrant 739-5685

A late 19th- to early 20th-century house (S-3222) stood in the south corner of this parcel, but was demolished in the early 1990s. It shows on the USGS 15' topographic map titled Millsboro 1917. There may be archaeological remains associated with this house. There are several houses (S-744, S-3223, S-3225, and S-11425) of this same period to the north on the same side of Bedford St. and immediately across Bedford St. from the parcel. The parcel has only a low potential for prehistoric-period archaeological sites.

DHCA would appreciate the opportunity to learn whether there are any significant archaeological resources left in the area of the house. They request that there be adequate landscaping to screen this development from the adjacent houses.

Department of Transportation – Contact: Bill Brockenbrough 760-2109

1) DelDOT has a project under development to add sidewalks along North Bedford Street as far north as the North Georgetown Elementary School. The plans for the subject development should be coordinated with that project, and the developer

may be required to provide right-of-way for the project and/or to build a section of it along their frontage. The developer's engineer should contact the DelDOT project manager, Mr. Anthony Aglio, regarding it. Mr. Aglio may be reached at (302) 760-2509.

2) While the use of wooded area in the southwest corner of the site for open space seems appropriate, DelDOT suggests that the proposed tot lot be moved to a more central location in the development to improve both access and safety. If this is not possible, a fence should be provided to prevent poorly attended children from wandering onto North Bedford Street.

3) Along the south edge of the subject land, there is a private right-of-way leading to a two-parcel enclave of land under County jurisdiction. If possible, the developer should work with the owners of that right-of-way to obtain the portion from Surrey Lane west and incorporate it into their development. Doing so would enable the proposed extension of Surrey Lane into the proposed development and eliminate traffic along the rear property line of the lots presently proposed to abut that right-of-way. One thing that the developer could offer in this regard, and that the Town should consider requiring, is the reservation of land for a proper street connection from the proposed development to the enclave.

4) DelDOT commends the developer for providing the proposed stub street to the lands of Alice C. Brumley.

5) The lots proposed along the west edge of the property should be buffered from the railroad line there. DelDOT recommends berms and vegetative screening, but at a minimum a fence should be provided to discourage residents from walking along the right-of-way.

6) The developer's site engineer should contact Mr. John Fiori, the DelDOT Subdivision Manager for Sussex County, regarding their specific requirements for access. He may be reached at (302) 760-2260.

The Department of Natural Resources and Environmental Control – Contact: Kevin Coyle 739-9071

Green Infrastructure

Portions or all of the lands associated with this proposal are within the Livable Delaware Green Infrastructure area established under Governor Minner's Executive Order #61 that

represents a network of ecologically important natural resource lands of special state conservation interest.

Green infrastructure is defined as Delaware's natural life support system of parks and preserves, woodlands and wildlife areas, wetlands and waterways, productive agricultural and forest land, greenways, cultural, historic and recreational sites and other natural areas all with conservation value. Preserving Delaware's Green Infrastructure network will support and enhance biodiversity and functional ecosystems, protect native plant and animal species, improve air and water quality, prevent flooding, lessen the disruption to natural landscapes, provide opportunities for profitable farming and forestry enterprises, limit invasive species, and foster ecotourism.

Voluntary stewardship by private landowners is essential to green infrastructure conservation in Delaware, since approximately 80 percent of the State's land base is in private hands. It is in that spirit of stewardship that the Department appeals to the landowner and development team to protect sensitive resources through an appropriate site design.

Soils

Based on the Sussex County soil survey Kenansville, Woodstown, Elkton, Fallsington, and Pocomoke were mapped in the immediate vicinity of the proposed project. Kenansville is a well-drained upland soil that, generally, has few limitations for development. Woodstown is a moderately well-drained soil of low-lying uplands that has moderate limitations for development. Elkton, Fallsington, and Pocomoke are poorly to very poorly-drained wetland associated (hydric) soils that have severe limitations for development. Approximately 50 percent of the mapped soils on this parcel are wetland associated (hydric) soils.

Since a significant portion of the farmed lands on this parcel contain wetland associated (hydric) soils, it is possible that they some of these farmed wetlands may be jurisdictional. Therefore, it is recommended that the Farm Services Agency of the USDA be contacted to assess whether any of the lands on subject parcel meet the recognized criteria for classification as "prior converted wetlands." Prior converted wetlands are farmed wetlands that have drained or altered before December 23, 1985, and no longer meet the wetland criteria established under the 404 program. Such wetlands are considered exempt from regulatory protection provided that there is no proof of a continuous "fallow period" of five years or greater in that parcel's cropping history. Parcels converted after said date regardless of cropping history are considered jurisdictional by the Army Corps of Engineers (ACOE). The contact person for assessing a parcel's cropping history is Sally Griffin at the USDA; she can be reached at 678-4182.

Impervious Cover

Based on a review of the submitted PLUS application, the applicant projects that only about 30% of this parcel will be rendered impervious following this parcel's development. However, this figure appears to be a significant underestimate given the scope and density of this project. The applicant should be made aware that all forms of constructed surface imperviousness (i.e., rooftops, sidewalks and roads) should be included in the impervious surface calculation; otherwise, an inaccurate assessment of this project's actual environmental impacts will result. It is strongly advised that this figure be recalculated to reflect all of the aforementioned forms of constructed post-development surface imperviousness.

Research has consistently shown that once a watershed exceeds a threshold of 10 percent imperviousness, water and habitat quality irreversibly decline. Based on analyses of 2002 aerial photography by the University of Delaware, the Broadkill watershed had about 7.9 percent impervious cover. Although this data is almost 4 years old and likely an underestimate, it underscores the importance of a proactive strategy to mitigate for predictable and likely cumulative environmental impacts. Since the amount of imperviousness generated by this project is likely to be much higher than the desirable watershed threshold of 10 percent, the applicant is strongly advised to pursue best management practices (BMPs) that mitigate or reduce some of the most likely adverse impacts. Reducing the amount of surface imperviousness through the use of pervious paving materials ("pervious pavers") in lieu of asphalt or concrete in conjunction with an increase in forest cover preservation or additional tree plantings are examples of practical BMPs that could easily be implemented to reduce surface imperviousness.

TMDLs

With the adoption of Total Maximum Daily Loads (TMDLs) as a "nutrient-runoff-mitigation strategy" for reducing nutrients in the Broadkill River watershed, reduction of nitrogen and phosphorus loading will be mandatory. A TMDL is the maximum level of pollution allowed for a given pollutant below which a "water quality limited water body" can assimilate and still meet water quality standards to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. Nutrient reductions prescribed under TMDLs are assigned to those watersheds or basins on the basis of recognized water quality impairments. Although TMDL nutrient reductions for nitrogen and phosphorus have not been finalized for the Broadkill River watershed to date, it is expected that reductions of 40 percent will be required for nitrogen and phosphorus, respectively.

TMDL Compliance through the PCS

The proposed Pollution Control Strategy will require the completion of a nutrient budget to estimate nutrient load changes following development; documentation of these load changes will be assessed through a nutrient budget protocol. The nutrient budget protocol is a computer-based model that quantifies post-development nutrient loading under a variety of land use scenarios in combination with a variety (or absence) of BMP types and intensities. The post-development loading rate is then compared with the pre-development loading rate to assess whether the project meets the prescribed TMDL nutrient load reductions. A preliminary evaluation of this project (using the applicant's assumptions as reported in the PLUS application), this project as currently conceived **will not** meet the expected Broadkill watershed TMDL reduction requirements for nitrogen. An estimate of this project's ability to meet the post-development phosphorus loading rate was not assessed at this time because some of the model assumptions (i.e., phosphorus loading rates from various land uses and land-use conversions) have not undergone the review process necessary to ensure technical validity. Therefore, phosphorus runoff impacts should not be assumed until this issue is resolved.

The applicant is strongly advised to be proactive and consider the use of appropriate BMPs and Best Available Technologies (BATs) as a means to ensure compliance with TMDL reduction requirements. Examples of BMPs or BATs that should be used to significantly reduce nutrient loading from this project include practices that prevent or mitigate or minimize created surface imperviousness, maintenance/restoration of recommended wetland buffer widths, reducing the amount of overall forest cover removal, utilization of performance-based wastewater disposal systems or - better yet - connection to public sewer (if available), and use of innovative "green-technology" stormwater methodologies rather than conventional open-water stormwater management structures. As mentioned previously, the impervious cover figure should be recalculated to include all forms of created surface imperviousness (i.e., rooftops, sidewalks, and roads); otherwise, this project's true environmental impacts will be underestimated. We also suggest that the applicant verify their project's compliance with the specified TMDL loading rates by running the model themselves (with a more realistic impervious cover figure). The applicant is requested to periodically check with our office for updated version of nutrient budget protocol. Please contact Lyle Jones of Watershed Section at 739-9939 for the acceptable model protocol.

Water Resource Protection Areas

The DNREC Water Supply Section has determined that the project falls partially within a wellhead protection area for Georgetown (see following map and attached map). The

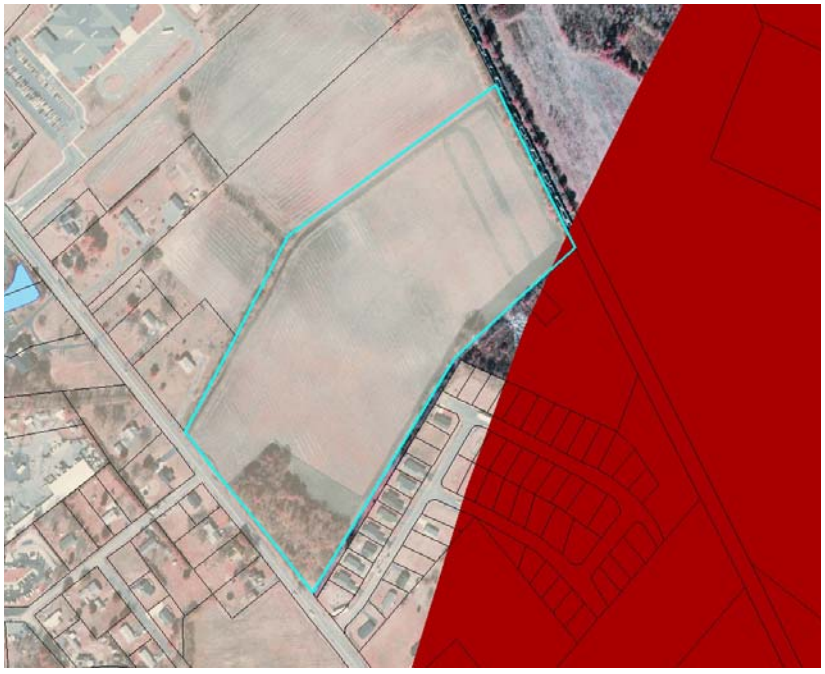
southeast part of the parcel is partially covered by the wellhead protection area. Wellhead protection areas are surface and subsurface areas surrounding a public water

supply well where the quantity and quality of groundwater moving toward such wells may be adversely affected by land use activities.

The development plan includes open space for passive recreation and storm water management. The wellhead area corresponds with open space containing a storm water management pond. This proposed use will have minimal impact.

For more information refer to the March 2004 Final:
Source Water Protection Guidance Manual for the Local Governments of Delaware
http://www.wr.udel.edu/swaphome/phase2/SWPguidancemanual.html
and
Ground-Water Recharge Design Methodology
http://www.wr.udel.edu/swaphome/phase2/Publications/swapp_manual_final/swapp_guidance_manual_supp_1_2005_05_02.pdf

Map of Georgetown Hunt Subdivision as it impacts the wellhead protection area. The dark red area shows the wellhead protection area.



Water Supply

The project information sheets state water will be provided to the project by the Town of Georgetown via a public water system. DNREC records indicate that the project is located within the public water service area granted to the Town of Georgetown under Certificate of Public Convenience and Necessity 01-CPCN-01.

Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per day at any time during operation.

All well permit applications must be prepared and signed by licensed water well contractors, and only licensed well drillers may construct the wells. Please factor in the necessary time for processing the well permit applications into the construction schedule. Dewatering well permit applications typically take approximately four weeks to process, which allows the necessary time for technical review and advertising.

Should you have any questions concerning these comments, please contact Rick Rios at 302-739-9944.

Sediment and Erosion Control/Stormwater Management

A detailed sediment and stormwater plan will be required prior to any land disturbing activity taking place on the site. The plan review and approval as well as construction inspection will be coordinated through the Sussex Conservation District. Contact Jessica Watson, Program Manager, at (302) 856-7219 for details regarding submittal requirements and fees.

It is strongly recommended that you contact the Sussex Conservation District to schedule a pre-application meeting to discuss the sediment and erosion control and stormwater management components of the plan. The site topography, soils mapping, pre- and post-development runoff, and proposed method(s) and location(s) of stormwater management should be brought to the meeting for discussion.

It is strongly recommended that you contact the Drainage Section to discuss any tax ditch easement and right-of-way requirements for any tax ditches on or adjacent to the property in question. If the project is proposing to discharge into any tax ditch, then a letter of no objection will need to be submitted from Drainage Section for the encroachment into the right-of-way.

A Notice of Intent (NOI) for Stormwater Discharges Associated with Construction Activity must be submitted to the Division of Soil and Water Conservation along with the $195 NOI fee prior to plan approval.

Applying practices to mimic the pre-development hydrology on the site, promote recharge, maximize the use of existing natural features on the site, and limit the reliance on structural stormwater components, such as maintaining open spaces, should be considered in the overall design of the project as a stormwater management technique.

Each stormwater management facility should have an adequate outlet for release of stormwater. Any drainage conveyed onto this site from neighboring properties must be adequately conveyed through the site to the discharge point without interruption.

Clearly address how Stormwater Quality and Quantity Treatment will be provided. If this project is eligible for a Quantity Waiver, please make the request in the stormwater narrative citing the specific regulation.

Please indicate on the sediment and stormwater management plan who shall be responsible for maintenance of the stormwater management facilities both during construction and after. During the design of the sediment control and stormwater management plan, considerations should be made for maintenance (i.e. access, easements, etc.) of any structures or facilities.

If a stormwater management pond is going to be utilized as a sediment trap/basin during construction, it must be designed to accommodate 3600 cubic feet of storage per acre of contributing drainage area until project stabilization is complete.

All ponds are required to be constructed per Pond Code 378.

Please note that if the stormwater facilities will impact wetlands, a permit must be provided to the District prior to receiving approval. Please address.

A Certified Construction Reviewer (CCR) is required for any project that is 50 acres or greater.

DNREC regulations require no more than 20 acres to be disturbed at one time. A phased erosion and sediment control plan and sequence of construction will be required.

Under the DNREC Health and Safety Memo of 2000, all wet ponds are required to have an open space depth of 3 feet or more that comprises 50-75 percent of the area of the pond.

Consideration should be made for any adjacent properties during the design of the project, including drainage and erosion/sediment control.

If any waivers and variances are sought for the project in question, these items should be addressed at the preliminary meeting. Any requests for waivers and variances should be included in the stormwater report narrative.

Drainage

A majority of this project is within the Savannah ditch watershed (which is currently undergoing a drainage study per Brooks Cahall). A small portion in the front is within the Georgetown-Vaughn tax ditch; however there are no direct outlets to the tax ditch. In addition, the Drainage Section advises the following in site development:

The Drainage Section requests that all existing ditches on the property be checked for function and cleaned if needed prior to the construction of homes. Wetland permits may be required before cleaning ditches.

The Drainage Section requests that all precautions be taken to ensure the project does not hinder any off site drainage upstream of the project or create any off site drainage problems downstream by the release of on site storm water.

The Drainage Section strongly recommends that any drainage conveyance between two parcels within a subdivision be dedicated as a drainage easement and such easement be designated as passive open space, not owned by individual landowners. The easement should be of sufficient width to allow for future drainage maintenance as described below:

- Along an open ditch or swale, the Drainage Section recommends a maintenance equipment zone of 25 feet measured from the top of bank on the maintenance side, and a 10-foot setback zone measured from top of bank on the non-maintenance side. These zones should be maintained as buffers to aid in the reduction of sediment and nutrients entering into the drainage conveyance. Grasses, forbs and sedges planted within these zones should be native species, selected for their height, ease of maintenance, erosion control, and nutrient uptake capabilities. Trees and shrubs planted within the maintenance zone should be native species spaced to allow for drainage maintenance at maturity. Trees should not be planted within 5 feet of the top of ditch to avoid future blockages from roots.

- Along a stormwater pipe, the Drainage Section recommends a maintenance equipment zone of 15 feet on each side of the pipe as measured from the pipe centerline. This zone should be maintained as buffers to aid in the reduction of sediment and nutrients entering into the drainage conveyance. Grasses, forbs and sedges planted within these zones should be native species selected for their height, ease of maintenance, erosion control, and nutrient uptake capabilities. Trees and shrubs planted within the maintenance zone should be spaced to allow for drainage maintenance at maturity.

The Drainage Section recommends that any drainage/utility easement owned by an individual landowner should not have structures, decks, buildings, sheds, kennels, fences or trees within the drainage easement to allow for future drainage maintenance.

Forest Preservation

It is recommended that the applicant consider removing lot #'s 44 and 45 to reduce the need to clear trees. In addition, trees should not be cleared from April 1st to July 31st to reduce impacts to birds and other wildlife that utilize forests for breeding.

Underground Storage Tanks

There are two inactive LUST sites located near the proposed project:

Shore Distributors, Inc., Facility # 5-000683, Project # S9110252
Maurice Dunn Property, Facility # 5-000716, Project # S9206164

No environmental impact is expected from the above inactive LUST sites. However, should any underground storage tank or petroleum contaminated soil be discovered during construction, the Tank Management Branch must be notified as soon as possible. It is not anticipated that any construction specifications would need to be changed due to petroleum contamination. However, should any unanticipated contamination be encountered and PVC pipe is being utilized, it will need to be changed to ductile steel with nitrile rubber gaskets in the contaminated areas.

Solid Waste

Each Delaware household generates approximately 3,600 pounds of solid waste per year. On average, each new house constructed generates an additional 10,000 pounds of construction waste. Due to Delaware's present rate of growth and the impact that growth will have on the state's existing landfill capacity, the applicant is requested to be aware of the impact this project will have on the State's limited landfill resources and, to the extent

possible, take steps to minimize the amount of construction waste associated with this development.

Air Quality

Once complete, vehicle emissions associated with this project are estimated to be 6.1 tons (12,279.2 pounds) per year of VOC (volatile organic compounds), 5.1 tons (10,166.3 pounds) per year of NOx (nitrogen oxides), 3.8 tons (7,500.9 pounds) per year of SO2 (sulfur dioxide), 0.3 ton (667.7 pounds) per year of fine particulates and 513.6 tons (1,027,136.5 pounds) per year of CO2 (carbon dioxide).

Emissions from area sources associated with this project are estimated to be 2.5 tons (4,952.7 pounds) per year of VOC (volatile organic compounds), 0.3 ton (545.0 pounds) per year of NOx (nitrogen oxides), 0.2 ton (452.2 pounds) per year of SO2 (sulfur dioxide), 0.3 ton (583.6 pounds) per year of fine particulates and 10.0 tons (20,077.3 pounds) per year of CO2 (carbon dioxide).

Emissions from electrical power generation associated with this project are estimated to be 1.0 tons (1,962.9 pounds) per year of NOx (nitrogen oxides), 3.4 tons (6,827.5 pounds) per year of SO2 (sulfur dioxide) and 503.5 tons (1,007,059.2 pounds) per year of CO2 (carbon dioxide).

	VOC	NOx	SO_2	$PM_{2.5}$	CO_2
Mobile	6.1	5.1	3.8	0.3	513.6
Residential	2.5	0.3	0.2	0.3	10.0
Electrical Power		1.0	3.4		503.5
TOTAL	8.6	6.4	7.4	0.6	1027.1

For this project the electrical usage via electric power plant generation alone totaled to produce an additional 1.0 tons of nitrogen oxides per year and 3.4 tons of sulfur dioxide per year.

A significant method to mitigate this impact would be to require the builder to construct Energy Star qualified homes. Every percentage of increased energy efficiency translates into a percent reduction in pollution. Quoting from their webpage, http://www.energystar.gov/:

“ENERGY STAR qualified homes are independently verified to be at least 30% more energy efficient than homes built to the 1993 national Model Energy Code or 15% more

efficient than state energy code, whichever is more rigorous. These savings are based on heating, cooling, and hot water energy use and are typically achieved through a combination of:

building envelope upgrades,
high performance windows,
controlled air infiltration,
upgraded heating and air conditioning systems,
tight duct systems and
upgraded water-heating equipment."

The Energy office in DNREC is in the process of training builders in making their structures more energy efficient. The Energy Star Program is excellent way to save on energy costs and reduce air pollution. They highly recommend this project development and other residential proposals increase the energy efficiency of their homes.

They also recommend that the home builders offer geothermal and photo voltaic energy options. Applicable vehicles should use retrofitted diesel engines during construction. The development should provide tie-ins to the nearest bike paths, links to mass transit, and fund a lawnmower exchange program for their new occupants.

State Fire Marshal's Office – Contact: Duane Fox 856-5298

These comments are intended for informational use only and do not constitute any type of approval from the Delaware State Fire Marshal's Office. At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

a. **Fire Protection Water Requirements**:
   - Where a water distribution system is proposed for single-family dwellings it shall be capable of delivering at least 500 gpm for 1-hour duration, at 20-psi residual pressure. Fire hydrants with 1000 feet spacing on centers are required.
   - The infrastructure for fire protection water shall be provided, including the size of water mains.

b. **Accessibility:**
   - All premises, which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all

buildings on the premises are accessible to fire apparatus. This means that the access road to the subdivision from North Bedford St must be constructed so fire department apparatus may negotiate it.

- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
- Any dead end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver. The minimum paved radius of the cul-de-sac shall be 38 feet. The dimensions of the cul-de-sac or turn-around shall be shown on the final plans. Also, please be advised that parking is prohibited in the cul-de-sac or turn around.
- The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.
- The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.

c. **Gas Piping and System Information:**

- Provide type of fuel proposed, and show locations of bulk containers on plan.

d. **Required Notes**:

- Provide a note on the final plans submitted for review to read " All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations"
- Name of Water Supplier
- Proposed Use
- National Fire Protection Association (NFPA) Construction Type
- Maximum Height of Buildings (including number of stories)
- Provide Road Names, even for County Roads

Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from our website: www.delawarestatefiremarshal.com, technical services link, plan review, applications or brochures.

Department of Agriculture - Contact: Milton Melendez 698-4500

The Delaware Department of Agriculture has no objections to the proposed development. The *Strategies for State Policies and Spending* encourages environmentally responsible development in areas within Investment Level 1 areas.

Right Tree for the Right Place

The Delaware Department of Agriculture Forest Service encourages the developer to use the "Right Tree for the Right Place" for any design considerations. This concept allows for the proper placement of trees to increase property values in upwards of 25% of appraised value and will reduce heating and cooling costs on average by 20 to 35 dollars per month. In addition, a landscape design that encompasses this approach will avoid future maintenance cost to the property owner and ensure a lasting forest resource.

Native Landscapes

The Delaware Department of Agriculture and the Delaware Forest Service encourages the developer to use native trees and shrubs to buffer the property from the adjacent land-use activities near this site. A properly designed forested buffer can create wildlife habitat corridors and improve air quality to the area by removing six to eight tons of carbon dioxide annually and will clean our rivers and creeks of storm-water run-off pollutants. To learn more about acceptable native trees and how to avoid plants considered invasive to our local landscapes, please contact the Delaware Department of Agriculture Plant Industry Section at (302) 698-4500.

Public Service Commission - Contact: Andrea Maucher 739-4247

Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines. Contact: Malak Michael at (302) 739-4247.

Delaware State Housing Authority – Contact Karen Horton 739-4263

The proposed development is an 80 lot major subdivision located on North Bedford Street in the town of Georgetown. According to the *State Strategies Map*, the proposal is located in an Investment Level 1 area. DSHA supports this proposal because residents will have proximity to services, markets, and employment opportunities. Furthermore, the proposal targets units for first time homebuyers. According to the most recent real estate data colleted by DSHA, the median home price in Sussex County is $237,000. However, families earning 100% of Sussex County's median income only qualify for mortgages of $171,216, thus creating an affordability gap of $65,784. The provision of units within reach of families earning at least 100% of Sussex County's median income would help increase housing opportunities for first homebuyers.

Department of Education – Contact: John Marinucci 739-4658

DOE offers the following comments on behalf of the Indian River School District.

1. Using the DOE standard formula, this development will generate an estimated 40 students.
2. DOE records indicate that the Indian River School Districts' *elementary schools **are** at or beyond 100% of current capacity* based on September 30, 2005 elementary enrollment.
3. DOE records indicate that the Indian River School Districts' *secondary schools **are not** at or beyond 100% of current capacity* based on September 30, 2005 secondary enrollment.
4. This development will create additional elementary student population growth which will further compound the existing shortage of space. The developer is strongly encouraged to contact the Indian River School District Administration to address the issue of elementary school over-crowding that this development will exacerbate.
5. DOE requests developer work with the Indian River School District transportation department to establish developer supplied bus stop shelter ROW and shelter structures, interspersed throughout the development as determined and recommended by the local school district.

Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of State Planning Coordination a written response to comments received as a result of the pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.

Thank you for the opportunity to review this project. If you have any questions, please contact me at 302-739-3090.

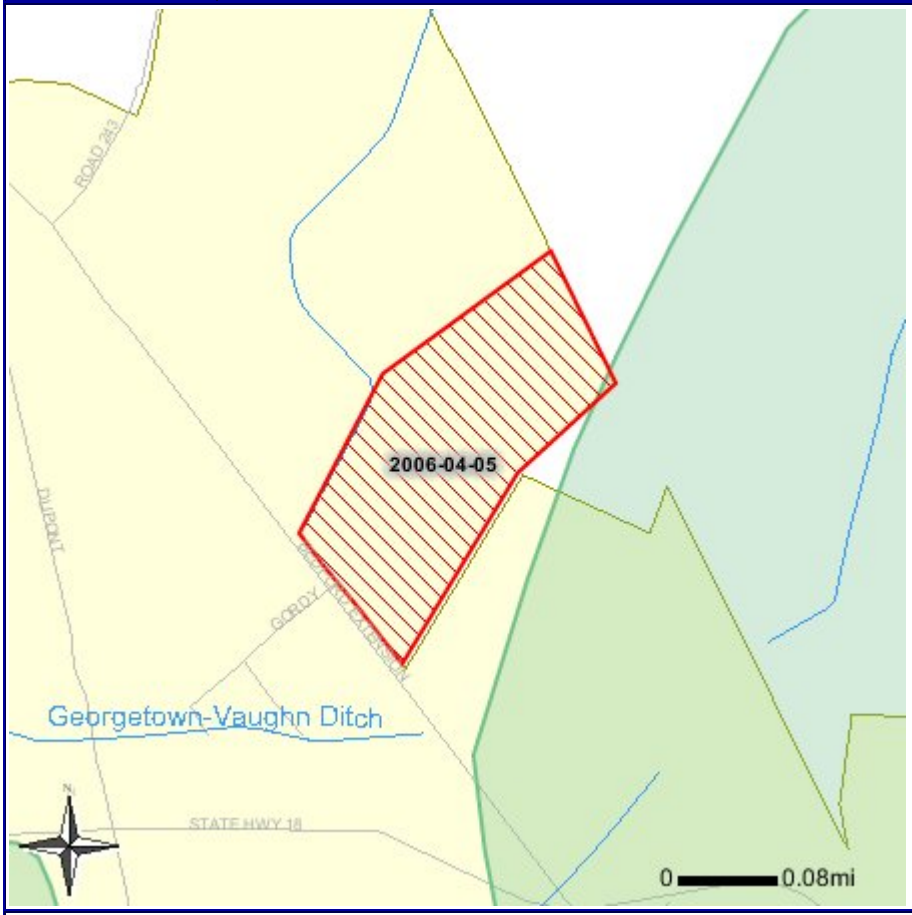
Sincerely,

For Constance C. Holland, AICP
Director

CC: Town of Georgetown

Georgetown Hunt

2006-04-05



PLUS Projects
NHDFlowLine
Sussex WHPA
All Roads
Towns

This map was produced by the Delaware
Department of Natural Resources and Environmental Control.